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*LM General Insurance Company,
 erroneously named as LM General
 Insurance Company aka Liberty Mutual
 Insurance Company*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EMILY SCHULTZ and DANIEL SCHULTZ,
 individually and as a Natural Parent and
 Guardian of E. S., a minor,

Plaintiffs,

v.

LM GENERAL INSURANCE COMPANY
 aka LIBERTY MUTUAL INSURANCE
 COMPANY, a foreign corporation; and
 DOES I through X; and ROE
 CORPORATIONS I through X, inclusive,

Defendants.

CASE NO.: 2:22-cv-00523-GMN-DJA
 DEPT. NO.:

**STIPULATION FOR EXTENSION OF
 TIME TO FILE ANSWER TO
 COMPLAINT**

First Request

Defendant LM General Insurance Company by and through their counsel, Clyde & Co US LLP, and Plaintiffs, by and through their counsel, Jerez Law, PLLC submit this Stipulation to Extend the Time Within Which to Answer Plaintiffs' Complaint.

The parties are attempting to resolve the lawsuit and believe that a settlement is possible within the next couple weeks. In order to facilitate that potential resolution, the parties have agreed to stay the time to respond to the complaint for thirty (30) days so that the resources can be conserved and directed towards a case resolution.

Therefore, the parties agree that the new deadline to answer the Complaint is **May 2, 2022**.

1 This is the first request by the parties to extend the time for Defendant to answer the
2 Compliant.

3
4 Dated: March 30, 2022

5
6 JEREZ LAW, PLLC

CLYDE & CO US LLP

7
8 /s/ Isaiah A. Jerez

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8 /s/ Dylan P. Todd

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12 *Attorneys for Defendant*

13 *LM General Insurance Company,*


14 *erroneously named as LM General*

15 *Insurance Company aka Liberty Mutual*

16 *Insurance Company*

17 **ORDER**

18 IT IS HEREBY ORDERED that the parties Stipulation For Extension Of Time To File
19 Answer to Complaint is granted. The new deadline for Defendant Safeco Insurance Company of
20 Illinois to answer the Complaint is May 2, 2022.

21
22 

23 Daniel J. Albregts
United States Magistrate Judge

24 DATED: March 31, 2022

Brouse, Gina

From: Isaiah Jerez <Isaiah@JerezLaw.com>
Sent: Tuesday, March 29, 2022 5:45 PM
To: Brouse, Gina
Cc: Todd, Dylan
Subject: Re: Schultz v. LM General Insurance Company - Stipulation for Extension of Time to File Answer [CC-US2.44331.10300928.FID946943]

Categories: Do Today

Yes, you have authority to affix my e-signature.

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From: Brouse, Gina <Gina.Brouse@clydeco.us>
Sent: Tuesday, March 29, 2022 6:01:04 PM
To: Isaiah Jerez <Isaiah@JerezLaw.com>
Cc: Todd, Dylan <Dylan.Todd@clydeco.us>
Subject: Schultz v. LM General Insurance Company - Stipulation for Extension of Time to File Answer [CC-US2.44331.10300928.FID946943]

Dear Mr. Jerez:

Please review the attached Stipulation for Extension of Time to File Answer. Please also let me know if we have your permission to use your E-signature upon same when we file it with the Court.

Thank you,

Gina Brouse
Legal Assistant | Clyde & Co US LLP
Direct Dial: +1 725 248 2885 | **Mobile:** 702 743 7380

CLYDE&CO

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